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May 10, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to the Court's order dated May 4, 2021, ECF No. 6792, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") regarding the timing of the five non-party depositions addressed by the Court's May 4 Order. The Plaintiffs' Executive Committees ("Plaintiffs") and Defendant Dallah Avco join in this letter.

Plaintiffs have opted not to proceed with the deposition of Abdulhafid Kebhah. The remaining four witnesses have given no indication that they will not comply with their legal obligations by appearing to testify in accordance with the subpoenas served on them. Plaintiffs, Saudi Arabia and Dallah Avco have agreed, for the time being, to proceed with these depositions on the dates set in the subpoenas. To the extent any of the remaining four witnesses properly seek to reschedule the dates of their depositions, counsel for Plaintiffs, Saudi Arabia, and Dallah Avco will jointly meet and confer – along with the witnesses or their counsel – to determine if a change in the schedule is appropriate and feasible.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)